



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

MAR 28 2006

Reply To
Attn Of: OCE-084

Mr. Bernard P. Leber, Jr.
Environmental Engineering Manager
Kaiser Aluminum & Chemical Corporation
Trentwood Works
P.O. Box 15108
Spokane, Washington 99215-5108

Re: PCB Remediation Plan Revised Approval

Dear Mr. Leber:

This letter is our revised response to your February 2, 2006, letter regarding the Proposed Work Plan for the Polychlorinated Bi-Phenyl (PCB) sampling, cleanup and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs at the Kaiser Aluminum & Chemical Corporation, Trentwood Works located at 15000 E. Euclid Ave., in Spokane, Washington.

Your proposed February 2006, PCB cleanup Work Plan for PCB contaminated residues, sludges, hydraulic fluid systems, and water in the Direct Chill Casting Complex DC-4, as described in your February 2, 2006, letter is acceptable to the U.S. Environmental Protection Agency, Region 10. Please see the enclosed revised PCB Remediation Plan approval, which supersedes our February 28, 2006, letter.

If you have any questions, please contact Daniel Duncan, Regional PCB Program Coordinator at (206) 553-6693 or duncan.daniel@epa.gov. If you have any questions on PCB sampling methods, please contact Mr. Roy Araki, Quality Assurance Manager, Office of Environmental Assessment, at (206) 553-6395.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

Enclosure

cc: Pat Hallinan- WDOE Eastern Regional Office
Teresita Bala- WDOE Eastern Regional Office

KAISER ALUMINUM & CHEMICAL CORPORATION PCB REMEDIATION PLAN
APPROVAL: TRENT WOOD WORKS, SPOKANE, WASHINGTON

The Kaiser Aluminum & Chemical Corporation will complete the following actions at the Trentwood Works as described in your February 2006, PCB Remediation Plan:

1. The Kaiser Aluminum & Chemical Corporation, Trentwood Works will complete the following PCB sampling and removal:
 - a. The removal of PCBs in accordance with 40 CFR § 761.61(a)(4)(i)(B) by July 30, 2006.
 - b. The removal of the PCB hydraulic machines containing PCBs \geq 50 ppm and disposal of the hydraulic fluid in accordance with 40 CFR § 761.60(b)(3) by July 30, 2006.
 - c. The removal and segregation of soil containing a PCB concentration of less than 1 ppm associated with the Direct Chill Casting Complex #4 (DC-4) including the DC-4 Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel in accordance with 40 CFR § 761.61(a)(4)(i)(B)(1) by July 30, 2006. The Kaiser Aluminum & Chemical Corporation will also comply with the capping requirements of 40 CFR § 761.61(a)(7) if PCBs remaining onsite are greater than 25 ppm and less than or equal to 100 ppm.
 - d. The removal of PCB-contaminated remediation waste from the Direct Chill Casting Complex #4 (DC-4) including the DC-4 Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel in accordance with 40 CFR § 761.60(b) by July 30, 2006.
 - e. The disposal of soil containing a PCB concentration of greater than 25 ppm and less than 50 ppm from the Direct Chill Casting Complex #4 (DC-4) including the DC-4 Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel in a landfill that is permitted by a State to receive municipal waste or industrial solid waste in accordance with 40 CFR § 761.61(a)(5)(v)(A) by July 30, 2006.
 - f. The manifesting offsite for disposal/incineration of all PCB waste with a PCB concentration of greater than or equal to 50 ppm, from the Direct Chill Casting Complex #4 (DC-4) including the DC-4 Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel, in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA) by July 30, 2006.
 - g. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.
 - h. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.

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- i. Characterization sampling under 40 CFR § 761.61(a)(2) for the Direct Chill Casting Complex #4 (DC-4) including the DC-4 Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel, shall be performed in accordance with 40 CFR §§ 761.260-274 (Subpart N).
 - j. Cleanup verification sampling under 40 CFR § 761.61(a)(6) for the Direct Chill Casting Complex #4 (DC-4) including the DC-4 Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel shall be performed in accordance with 40 CFR §§ 761.280-298 (Subpart O).
 - k. Decontaminate the moveable equipment in accordance with 40 CFR §§ 761.61(a)(4)(i) and (iii), and 40 CFR § 761.79.
 - l. Dispose of liquid solvents and cleaning solutions in accordance with 40 CFR §§ 761.60 and 761.61(a)(5)(v).
 - m. In the alternative, continue to use PCB contaminated porous surfaces at the Trentwood Works Direct Casting Complex #4 (DC Casting Pit, Casting Pit Vent, Mold Water Pit, and Mechanical Tunnel), in accordance with 40 CFR § 761.30(p). The Kaiser Aluminum & Chemical Corporation will notify EPA Region 10 regarding the continued use of porous surfaces of DC-4 under 40 CFR § 761.30(p).
2. The Kaiser Aluminum & Chemical Corporation, Trentwood Works will complete the following hydraulic fluid, soil and water sampling and removal:
- a. Once Kaiser Aluminum & Chemical Corporation removes the Casting Pit Vent, it will perform sampling in accordance with 40 CFR 761.61(a)(2) to determine whether soil and water from the Casting Pit Vent and the Casting Pit has been contaminated. If contamination is discovered, the soil, hydraulic fluid, and water shall be remediated in accordance with 2.c, 2.d, and 2.e below. The Kaiser Aluminum & Chemical Corporation will notify EPA 10 regarding the soil and water sampling.
 - b. Upon receiving the sampling results, a preliminary report will be submitted to EPA providing the results for the soil that exceeds 25 ppm PCBs from below the Casting Pit Vent and Casting Pit. The Kaiser Aluminum & Chemical Corporation will notify EPA Region 10 of any structural integrity issues regarding soil removal.
 - c. The removal of PCB contaminated soil to less than 25ppm PCBs in accordance with 40 CFR § 761.61(a). The removal of the PCB contaminated hydraulic fluid in accordance with 40 CFR § 761.60(b)(3).

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- d. The removal of PCB contaminated water to less than $0.5\mu\text{g/L}$ (~0.5 ppm) in accordance with 40 CFR § 761.79(b)(1)(iii).
 - e. Disposal requirements, record keeping, and PCB verification sampling for all concrete, soil and contaminated water PCB waste will be conducted in accordance with 1.h, 1.i and 1.j of this letter.
3. The Kaiser Aluminum & Chemical Corporation, Trentwood Works will provide to EPA Region 10 and the Washington Department of Ecology (WDOE) final reports documenting the completion of the above items. This report will be provided no later than September 30, 2006, for the PCB remediation waste cleanup. The report will also include:
- a. The results of verification asphalt, hydraulic fluid, water and soil sampling and disposal. If a determination is made that asphalt and water sampling is not required, the basis of that determination will be provided. The disposal of all hydraulic machines and hydraulic fluid under 40 CFR § 761.60(b)(3).
 - b. The results of verification sampling confirming that the cleanup standards of 40 CFR § 761.61(a)(4) have been achieved.
 - c. The identification on drawings at the Trentwood Works of the existence of TSCA-regulated PCB waste and contamination, if any, that is left in place in the Direct Chill Casting Complex (DC#4) in excess of the cleanup standards of 40 CFR § 761.61(a)(4). The identification should indicate the need for additional precautions during future modification, renovation, or demolition of the affected area of the facility.
 - d. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.125(b)(3)(ix)(A) and (B), as well as the number of acres remediated. Although not required for compliance with self-implementing remediation under 40 CFR § 761.61(a), the Kaiser Aluminum & Chemical Corporation Trentwood Works as well as the WDOE should also maintain this information.
4. The Kaiser Aluminum & Chemical Corporation Trentwood Works is responsible for complying with the requirements of other federal laws and applicable Washington State requirements under the WDOE (Amended Order No. 2868 and Agreed Order No. 2692).